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**From:** Leifer, Kerry [Leifer.Kerry@epa.gov]  
**Sent:** 2/24/2021 12:16:46 PM  
**To:** Leifer, Kerry [Leifer.Kerry@epa.gov]  
**Subject:** FW: PFAS in HDPE containers

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Kerry Leifer, Chief  
Chemistry, Inerts and Toxicology Assessment Branch  
Registration Division (7505P)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, DC 20460  
tel: (703) 308-8811  
fax: (703) 605-0781

e-mail: [leifer.kerry@epa.gov](mailto:leifer.kerry@epa.gov)

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**From:** Leifer, Kerry  
**Sent:** Tuesday, February 16, 2021 10:15 AM  
**To:** Aubee, Catherine <Aubee.Catherine@epa.gov>  
**Subject:** RE: PFAS in HDPE containers

Hi Catherine,

We will be taking a look at not only InertFinder, but also OPPIN and other sources to see if these substances are actually in currently registered pesticide products (I suspect some may be, so in those cases it is not an Inert Finder issue but rather a broader policy issue).

I also continue to have concerns with what substances are characterized as PFAS. For example, one of the substances on the PEER list is 1,1-difluoroethane—which is also known as refrigerant 152a and is used as an alternative to ozone-depleting CFCs. I am not aware that this is considered a perfluoro- or polyfluoro- substance. It has C-H bonds that haven't been replaced with F. In skimming over the PEER list, there are a few other examples. If we are going to have to continually address the PFAS issue, we need to have a totally agreed-upon list/definition of what substances are organofluorines and which are PFAS.

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Kerry Leifer, Chief  
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Washington, DC 20460  
tel: (703) 308-8811  
fax: (703) 605-0781

e-mail: [leifer.kerry@epa.gov](mailto:leifer.kerry@epa.gov)

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**From:** Aubee, Catherine  
**Sent:** Friday, February 12, 2021 10:54 AM  
**To:** Leifer, Kerry <[Leifer.Kerry@epa.gov](mailto:Leifer.Kerry@epa.gov)>  
**Subject:** Fwd: PFAS in HDPE containers

Screenshots below/attached.

Best,  
Catherine  
Associate Director  
OPP Registration Division  
US Environmental Protection Agency

Begin forwarded message:

**From:** Kyla Bennett <[KBennett@peer.org](mailto:KBennett@peer.org)>  
**Date:** February 12, 2021 at 10:48:27 AM EST  
**To:** "Nesci, Kimberly" <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>  
**Cc:** "Aubee, Catherine" <[Aubee.Catherine@epa.gov](mailto:Aubee.Catherine@epa.gov)>, "Nguyen, Thuy" <[Nguyen.Thuy@epa.gov](mailto:Nguyen.Thuy@epa.gov)>, Timothy Whitehouse <[twhitehouse@peer.org](mailto:twhitehouse@peer.org)>  
**Subject:** Re: PFAS in HDPE containers

Thank you so much for talking with us today, Kimberly, Thuy, and Catherine.

Here are the PFAS I found in the InertFinder (I think all but two of these are PFAS). I look forward to speaking to Kerry about how this works.

Best,

Kyla

Kyla Bennett, PhD, JD  
Director, New England PEER  
P.O. Box 574  
North Easton, MA 02356  
508-230-9933  
[kbennett@peer.org](mailto:kbennett@peer.org)  
[www.peer.org](http://www.peer.org)

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**From:** Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>  
**Sent:** Thursday, February 11, 2021 10:27 AM  
**To:** Kyla Bennett <[KBennett@peer.org](mailto:KBennett@peer.org)>  
**Cc:** Messina, Edward <[Messina.Edward@epa.gov](mailto:Messina.Edward@epa.gov)>; Aubee, Catherine <[Aubee.Catherine@epa.gov](mailto:Aubee.Catherine@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>; Nguyen, Thuy <[Nguyen.Thuy@epa.gov](mailto:Nguyen.Thuy@epa.gov)>; Timothy Whitehouse <[twhitehouse@peer.org](mailto:twhitehouse@peer.org)>  
**Subject:** RE: PFAS in HDPE containers

10:00 is ideal. I've just sent you an invite, and a Teams link will follow. Thank you.

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**From:** Kyla Bennett <[KBennett@peer.org](mailto:KBennett@peer.org)>  
**Sent:** Thursday, February 11, 2021 10:07 AM  
**To:** Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>  
**Cc:** Messina, Edward <[Messina.Edward@epa.gov](mailto:Messina.Edward@epa.gov)>; Aubee, Catherine <[Aubee.Catherine@epa.gov](mailto:Aubee.Catherine@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>; Nguyen, Thuy <[Nguyen.Thuy@epa.gov](mailto:Nguyen.Thuy@epa.gov)>; Timothy Whitehouse <[twhitehouse@peer.org](mailto:twhitehouse@peer.org)>  
**Subject:** Re: PFAS in HDPE containers

Hi, Kimberly. I would welcome the opportunity to discuss my questions. How does 10 a.m. tomorrow work? If that isn't good for you, we can try to find another time.

I have copied Time Whitehouse, PEER's Executive Director, on this email as he would like to join the call.

Thank you so much.  
Kyla

Kyla Bennett, PhD, JD  
Director, New England PEER  
P.O. Box 574  
North Easton, MA 02356  
508-230-9933  
[kbennett@peer.org](mailto:kbennett@peer.org)  
[www.peer.org](http://www.peer.org)

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**From:** Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>  
**Sent:** Thursday, February 11, 2021 9:55 AM  
**To:** Kyla Bennett <[KBennett@peer.org](mailto:KBennett@peer.org)>  
**Cc:** Messina, Edward <[Messina.Edward@epa.gov](mailto:Messina.Edward@epa.gov)>; Aubee, Catherine <[Aubee.Catherine@epa.gov](mailto:Aubee.Catherine@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>; Nguyen, Thuy <[Nguyen.Thuy@epa.gov](mailto:Nguyen.Thuy@epa.gov)>  
**Subject:** RE: PFAS in HDPE containers

Dear Dr. Bennett,

I'm responding to your email below on behalf of Ed Messina. Would you have time tomorrow morning for a call to discuss your questions below? We share your deep concern, and I look forward to talking with you.

Best,  
Kimberly

Kimberly Nesci, Director  
Biological and Economic Analysis Division (BEAD)  
Office of Pesticide Programs  
Office of Chemical Safety and Pollution Prevention  
703-969-9109 (cell)

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**From:** Kyla Bennett <[KBennett@peer.org](mailto:KBennett@peer.org)>  
**Sent:** Tuesday, February 9, 2021 12:21 PM

**To:** Messina, Edward <Messina.Edward@epa.gov>

**Subject:** PFAS in HDPE containers

Hi, Ed. I want to thank you for joining the Mosquito Control for the Twenty-first Century Task Force meeting last week, and for sharing EPA's ongoing work on the fluorinated HDPE containers. I wanted to take advantage of your generous offer to speak offline about the work you're doing.

PEER did a FOIA for your test results on the containers on 1/15, and a response is due 2/19. Is there any way we could get those data from you, or do we have to wait for the FOIA process (which, as you know, can be incredibly long)?

I also have a few questions. I asked whether any of Clarke's other 59 pesticide products used these fluorinated containers, and you responded that some, but not all, did. Why is the company not red tagging those pesticides as well? Shouldn't the public be informed?

Also, you told me that EPA had removed the legacy PFAS approved inerts from InertFinder. And I see that the list is different, but it still includes a lot of different PFAS that were not there before. Can you explain to me what is going on (I'm hoping I'm misunderstanding what I'm seeing)? Why would any PFAS be on this list?

As you know, PEER is deeply concerned about the presence of PFAS in pesticides, and in these containers. We appreciate the work you are doing on this, but would love to understand it a little better.

Thanks so much,

Kyla

Kyla Bennett, PhD, JD  
Director, New England PEER  
P.O. Box 574  
North Easton, MA 02356  
508-230-9933  
[kbennett@peer.org](mailto:kbennett@peer.org)  
[www.peer.org](http://www.peer.org)

Search Criteria

Search Term: fluoro



**Food and Nonfood Use (cleared for both)**

Click ingredient name for required use limitations in the CFR.

CAS Reg. No.	Ingredient Name
75-37-6	1,1-Difluoroethane (Commodity Inert Ingredient)
811-97-2	1,1,1,2-Tetrafluoroethane
9002-84-0	Teflon
-	Fluoroapatite
29118-24-9	Trans-1,3,3,3-tetrafluoroprop-1-ene

row(s) 1 - 5 of 5



**Nonfood Use Only**

CAS Reg. No.	Ingredient
131324-06-6	Poly(difluoromethylene), alpha-chloro-omega-(1-chloro-1-fluoroethyl)-
1320-37-2	Dichlorotetrafluoroethane
163440-89-9	Poly(difluoromethylene), alpha-(2,2-dichloro-2-fluoroethyl)-omega-hydro-
188027-78-3	5H-1,3-Dioxolo[4,5-f]benzimidazole, 6-chloro-5-[(3,5-dimethyl-4-isoxazolyl)sulfonyl]-2,2-difluoro
24937-79-9	Ethene, 1,1-difluoro-, homopolymer
25067-11-2	Hexafluoropropene, polymer with tetrafluoroethylene
2837-89-0	2-Chloro-1,1,1,2-tetrafluoroethane (For use in sterilant mixture with ethylene oxide only)
65530-66-7	Poly(difluoromethylene), alpha-fluoro-omega-[2-[(2-methyl-1-oxo-2-propenyl)oxy]ethyl]- (9C
65530-85-0	alpha-(Cyclohexylmethyl)-omega-hydroxy(difluoromethylene)
65545-80-4	Poly(oxy-1,2-ethanediyl), alpha-hydro-omega-hydroxy-, ether with alpha-fluoro-omega-(2-hydroxyethyl)poly(difluoromethylene) (1:1)



## Nonfood Use Only

CAS Reg. No.	Ingredient
354-33-6	Ethane, 1,1,1,2,2-pentafluoro-
42557-13-1	Poly(oxy(methyl(3,3,3-trifluoropropyl)silylene)), alpha-(trimethylsilyl)-omega((trimethylsilyloxy)-
431-89-0	Propane, 1,1,1,2,3,3,3-Heptafluoro-
593-70-4	Fluorochloromethane
63148-56-1	Siloxanes and silicones, Me 3,3,3-trifluoropropyl
67786-14-5	2-Naphthalenesulfonic acid, 6-amino-4-hydroxy-5-({2-(trifluoromethyl)phenyl}azo)-, monosodium s
79070-11-4	Poly(difluoromethylene), .alpha.-chloro-.omega.-(2,2-dichloro-1,1,2-trifluoroethyl)- (CA
88795-12-4	1-Butanol, 4-(ethenyloxy)-, polymer with chlorotrifluoroethene, (ethenyloxy)cyclohexane and ethoxyethene
-	Montmorillonite-type clay treated with polytetrafluoroethylene

< Previous row(s) 11 - 19 of 19